

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**SECOND SET OF INFORMATION REQUESTS TO
KEYSPAN ENERGY DELIVERY NEW ENGLAND
D.T.E. 05-8**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to KeySpan Energy Delivery New England (“KeySpan” or “Company”) the following Information Requests:

INSTRUCTIONS

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed. Further, these requests shall be deemed continuing so as to require further supplemental responses if the or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
3. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
4. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
5. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

6. Please serve copies of the responses as follows: one (1) copy of the responses to Mary Cottrell, Secretary of the Department and on all parties; one (1) copy of the responses to Michael Killion, Hearing Officer, on three-hole punch paper; three (3) copies of the responses to Andréas Thanos, Gas Division.

INFORMATION REQUESTS

- DTE-2-1 Please refer to section 1.5 of the contract FLS160, what is the current maximum LNG storage capacity of the 13 facilities listed? Please discuss whether there are any plans for expansion of any of these facilities.
- DTE- 2-2 Please refer to section 4.1 of the contract FLS160. What is the amount of LNG used for cool down per truck and the associated cost per contract?
- DTE-2-3 Please refer to page 6 of Exhibit EDA-1, under the third amendment to contract FCS027:
(a) What potential dollar savings does the Company expect to realize from this amendment; and
(b) How does the repositioning of these contract gas supplies support increased efficiencies in the Company's system?
- DTE-2-4 Please refer to page 7 of Exhibit EDA-1. To what extent did the inclusion of contract FLS129 in the negotiations have a possible negative effect in the overall outcome of this negotiations?
- DTE-2-5 Please refer to page 10 of Exhibit EDA-1. What was the cost increase in trucking when considering alternate suppliers of LNG?
- DTE-2-6 Please refer to page 11 of Exhibit EDA-1. What new LNG supplies, provided by new LNG projects, does the Company expect to be available through 2011 as an option or supplement to the DOMAC contracts?